

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

MDL NO. 1456

THIS DOCUMENT RELATES TO:

ALL ACTIONS

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

**DECLARATION OF MARC H. EDELSON IN SUPPORT OF CLASS COUNSEL'S
PETITION FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES IN
RELATION TO SETTLEMENT WITH GSK**

I, Marc H. Edelson, being duly sworn, depose and say:

1. I am a partner of the law firm of Hoffman & Edelson, LLC one of the Co-Lead Class Counsel for plaintiffs in this matter. I am submitting this Declaration in support of all Plaintiffs' Counsel's (including my firm's) application for an award of attorneys' fees and reimbursement of expenses provided in connection with the services rendered to plaintiffs and the Class by Plaintiffs Class Counsel in the course of this litigation.

2. I am an attorney in good standing and duly licensed and admitted to the Bars of New York and Pennsylvania. The testimony set forth in this Declaration is based on first-hand knowledge, about which I could and would testify competently in open Court if called upon to do so.

3. My firm is counsel of record for plaintiff, Philadelphia Federation of Teachers Health and Welfare Fund. As one of Plaintiffs' Co-Lead Class Counsel, my firm collected and tracked loadstar and expenses by Plaintiffs' Class Counsel from the inception of the litigation.

4. I attach, as Exhibit 1, a detailed summary indicating the amount of hours spent by each firm who worked on this litigation and the lodestar calculation based on each firm's historical billing rates (the rates for each timekeeper that were in effect during this litigation, and when the work was performed). The schedule was prepared from computerized records that were contemporaneously generated and kept by each firm in the ordinary course of its business. Time expended in preparing Plaintiffs' Class Counsel's application for fees and reimbursement of expenses has not been included in the hour or lodestar calculations.

5. Each firm listed on Exhibit 1, in addition to computerized backup of its hours and expenses, has provided a Declaration confirming the hours and expenses shown on Exhibit 1 for their firm. Co-Lead Class Counsel will provide such declarations and/or printout of the detailed timekeeping records upon request.

6. From the inception of the case through August 10, 2006¹, Plaintiffs' Class Counsel expended a total of 176,543.88 hours on behalf of the Class Plaintiffs and the Class. The total lodestar amount for these hours based on each firm's historical hourly billing rates is \$57,279,201.05. The hourly rates used in determining the loadstar set out in Exhibit 1 are the same rates that each firm charged, and collected from, its hourly clients paying for services on a non-contingent basis and on which they have received fee awards from other courts.

7. In addition, as detailed in Exhibit 1, Plaintiffs' Class Counsel expended a total of \$5,561,128.12 in expenses in connection with the prosecution of this litigation up to August 10, 2006. None of these expenses have been reimbursed to date.

8. Each firm has represented to Co-Lead Class Counsel that they recorded these expenses as they were incurred, and they are reflected in its computerized bookkeeping records

¹ August 10, 2006 is the date the Settlement Agreement with GSK and Plaintiffs' Motion for Preliminary Approval of the Settlement was entered with the Court.

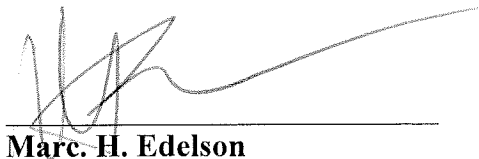
which were created from invoices, receipts and other proofs of the charges and payments.

Evidence of same will be provided to the Court upon request.

9. Thus, for this litigation, the total historical lodestar of for all Plaintiffs firms is \$57,279,201.05 and the firms incurred expenses of \$5,561,128.12.

I declare under penalty of perjury under the laws of the Commonwealth of Massachusetts that the foregoing is true and correct to the best of my knowledge.

Executed this 22nd day of June, 2007.



Marc. H. Edelson

EXHIBIT 1

AWP/GSK Settlement Lodestar and Expenses Report			
Firm Name	Firm Hours as of 8/10/06	Lodestar as of 8/10/06	Expenses as of 8/10/06
Audet & Partners, LLP	960.00	\$353,250.00	\$18,550.17
Bolognese & Associates, LLC	1,807.25	\$485,487.50	\$25,665.10
Carey & Danis, LLC	463.45	\$120,837.50	\$20,867.82
Cohen, Milstein, Hausfeld & Toll, P.L.L.C.	1,350.60	\$404,187.50	\$15,996.13
Cuneo Gilbert & Lacua, LLP	2,307.25	\$948,111.25	\$119,405.45
Freedman & Lorry, P.C.	26.10	\$5,872.50	\$0.00
Hagens Berman Sobol Shapiro LLP	37,595.42	\$12,885,029.50	\$1,182,774.58
Hanzman, Criden & Love, P.A.	53.50	\$35,531.25	\$632.33
Heins, Mills & Olson, P.L.C.	21,037.50	\$6,736,206.25	\$595,699.22
Hoffman & Edelson, LLC	24,422.20	\$8,415,576.00	\$836,780.57
Hulett Harper Stewart LLP	19.80	\$10,098.00	\$1,682.69
Karmel Law Firm	78.25	\$31,300.00	\$423.37
Kline & Specter, P.C.	6,681.75	\$2,093,136.25	\$404,180.02
Law Office of Adam S. Levy	766.75	\$295,198.75	\$9,229.62
Milberg Weiss & Bershad LLP	701.25	\$209,860.00	\$4,945.25
Piper & Associates	2,353.00	\$782,050.00	\$109,883.58
RodaNast, P.C.	4,260.10	\$983,957.75	\$14,812.38
Rossbacher Firm	549.45	\$146,534.25	\$42,620.95
Sheller, P.C.	7,235.10	\$2,066,208.25	\$103,647.94
Shepherd, Finkleman, Miller & Shah, LLC	4,255.00	\$1,418,815.00	\$29,738.72
Spector, Roseman & Kodroff, P.C.	20,333.10	\$6,478,896.75	\$983,828.42
Squitieri & Fearon, LLP	345.50	\$121,062.50	\$17,902.03
Trujillo Rodriguez & Richards, LLC	1,289.80	\$399,089.50	\$2,198.45
Weller, Green, Toups & Terrell, L.L.P.	4,513.70	\$1,532,465.00	\$34,618.30
Wexler Toriseva Wallace LLP	28,588.71	\$8,794,126.05	\$949,119.27
Williams Law Firm	3,883.25	\$1,246,961.25	\$35,869.89
Young, Pickett & Lee	657.10	\$279,352.50	\$55.87
TOTAL	176,534.88	\$57,279,201.05	\$5,561,128.12